

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

<b>IN RE:</b>	§	
	§	<b>CASE NO. 15-10109-HCM</b>
<b>COINTERRA, INC.</b>	§	
	§	<b>CHAPTER 7</b>
<b>DEBTOR</b>	§	

**RESPONSE OF RANDOLPH N. OSHEROW, TRUSTEE, TO APPLICATION OF  
OPEN-SILICON, INC., FOR ADMINISTRATIVE EXPENSE CLAIM**

TO THE HONORABLE H. CHRISTOPHER MOTT, U. S. BANKRUPTCY JUDGE:

COMES NOW Randolph N. Osherow, Chapter 7 Trustee (“Trustee”) and files this Response to *Application of Open-Silicon, Inc., For Administrative Expense Claim* (the “Application”) and in support thereof would respectfully show the Court the following:

1. Trustee admits the allegations in Paragraph 1 of the Application.
2. Trustee admits the allegations in Paragraph 2 of the Application.
3. Trustee admits the allegations in Paragraph 3 of the Application.
4. Trustee admits the allegations in Paragraph 4 of the Application.
5. Trustee admits the allegation in Paragraph 5 that OSI filed its Objection to Fortis’s Stay Relief Motion and alleged that the Voluntary Petition of Cointerra triggered conversion of Fortis’s security interest to common equity.
6. Trustee admits the allegations in Paragraph 6 of the Application.
7. Trustee admits the allegations in Paragraph 7 of the Application.
8. Trustee admits the allegations in Paragraph 8 of the Application.
9. Paragraph 9 of the Application contains allegations of law and not fact as to the existence of the Court’s subject matter jurisdiction to which no admission or denial is required.
10. Paragraph 10 of the Application contains an allegation of law and not fact to which no admission or denial is required.

11. Paragraph 11 of the Application contains an allegation of law and not fact to which no admission or denial is required.

12. Paragraph 12 of the Application contains an allegation of law and not fact to which no admission or denial is required.

13. Trustee cannot admit or deny the allegations in Paragraph 13 of the Application but requests the Court determine any reasonable amount to be distributed to applicant.

14. Trustee admits the allegations in Paragraph 14 of the Application.

15. Trustee admits the allegations in Paragraph 15 of the Application.

16. Trustee cannot admit or deny the allegations in Paragraph 16 of the Application but would request that if this Court agrees that any compensation is meritorious, it be reasonable.

Respectfully submitted,

BARRETT DAFFIN FRAPPIER  
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By: /s/ Steve Turner

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ATTORNEYS FOR RANDOLPH N. OSHEROW,  
CHAPTER 7 TRUSTEE

CERTIFICATE OF MAILING

By my signature below, I hereby certify that on the 25th day of May, 2016, a true and correct copy of the foregoing document was served upon the following parties via electronic means as listed on the Court's ECF noticing system or by regular first class mail.

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